

United States District Court
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

FARHAD SHAHROKHI,

Plaintiff,

v.

THE UNIVERSITY OF NORTH TEXAS,

Defendant.

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Civil Action No. 4:19-CV-403
Judge Mazzant

VERDICT FORM

We, the Jury, find as follows:

Title VII Discrimination Claim

Question No. 1

Has Plaintiff Dr. Farhad Shahrokhi proved that Defendant UNT's decisions to set his salary, ratings for his performance evaluations, assign workload and teaching assignments, and move his workspace were "adverse employment actions" under the definition of "adverse employment actions" for a discrimination claim?

Answer "Yes" or "No" to each:

Setting his salary

No

Performance evaluations

No

Assigning workload and teaching assignments

No

Relocating workspace

No

If you answered "Yes" to any of the above in Question No. 1, proceed to Question No. 2. If you answered "No" to all in Question No. 1, then proceed to Question No. 3.

Question No. 2

Has Plaintiff Dr. Farhad Shahrokhi proved that he would not have been subjected to adverse employment actions in the absence of—in other words, but for his national origin?

Answer “Yes” or “No”

Proceed to Question 3.

Title VII Retaliation Claim

Question No. 3

Has Plaintiff Dr. Farhad Shahrokhi proved that Defendant UNT’s decisions to set his salary, ratings for his performance evaluations, assign workload and teaching assignments, and move his workspace were “adverse employment actions” under the definition of “adverse employment actions” for a retaliation claim?

Answer “Yes” or “No” to each:

Setting his salary

_____ yes _____

Performance evaluations

_____ yes _____

Assigning workload and teaching assignments

_____ No _____

Relocating workspace

_____ yes _____

If you answered “Yes” to any of the above in Question No. 3, proceed to Question No. 4. If you answered “No” to all in Question No. 3, then proceed to Question No. 5.

Question No. 4.

Do you find that Plaintiff Dr. Farhad Shahrokhi would not have been subjected to an adverse employment action but for his complaints based on national origin?

Answer “Yes” or “No”

_____ Yes _____

Proceed to Question 5.

Question No. 5.

Only answer Question No. 5 if you have answered "Yes" to Question No. 2 and/or Question No. 4. If you answered "No" to both Question No. 2 and Question No. 4, proceed to the signature line.

What sum of money, if any, if paid now in cash, would fairly and reasonably compensate Plaintiff Dr. Farhad Shahrokhi for the damages, if any, you have found Defendant UNT's wrongful conduct, if any, caused Plaintiff Dr. Farhad Shahrokhi?

Answer in dollars and cents for the following item:

Past wages and benefits from February 8, 2017, to today.

\$ 17,819.39

Proceed to Question No. 6.

Question No. 6.

Do you find that Plaintiff Dr. Farhad Shahrokhi failed to reduce his damages through the exercise of reasonable diligence in seeking, obtaining, and maintaining substantially equivalent employment after the date of any adverse employment action?

Answer "Yes" or "No"

No

If you answered "Yes" to Question No. 6, then answer Question No. 7. If you answered "No" to Question No. 6, proceed to the signature line.

Question No. 7.

How much would Plaintiff Dr. Farhad Shahrokhi have earned had he exercised reasonable diligence under the circumstances to minimize his damages?

Answer in dollars and cents, if any.

\$ _____

Proceed to signature line.

Date: 6/28/21

Presiding Juror: 